Environmental Protection Agency, Region III
Resource Conservation and Recovery Act – Subtitle C
RCRA Section

Compliance Evaluation Inspection

Copperhead Chemical Co. Inc.
120 River Road
Tamaqua, PA 18252

EPA ID Number PAR000030874
NAICS Codes 325412 & 325920
Inspection Dates July 17-18, 2019

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8/27/2019
Stephen Forostiak — Date
Lead Inspector

for 8/27/19
Jeanna Henry — Date
RCRA Section Chief

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1.0 Introduction

On July 17, 2019, the United States Environmental Protection Agency, Region III (EPA), Enforcement and Compliance Assurance Division, RCRA Section, conducted an unannounced Compliance Evaluation Inspection (CEI) under the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. Sections 6901 et seq. of Copperhead Chemical Co., Inc. in Tamaqua, Pennsylvania ("Copperhead" or the "Facility"). The EPA representatives were Stephen Forostiak, lead inspector, and Rebecca Serfass. Prior to the inspection date, EPA provided notification to the Pennsylvania Department of Environmental Protection ("PADEP"). A PADEP representative was not present during this CEI.

We arrived at the Facility around 8:30 am and checked in at security check point. Ms. Serfass and I displayed our credentials to the security person who then contacted Mr. Kaiya Campbell, Safety, Health, and Environmental Supervisor for Copperhead. Mr. Campbell escorted us to an office in the main building. I provided an opening conference to discuss the scope and purpose of this CEI.

Information included in this report is the result of statements made by Facility representatives, materials shown to the inspectors by Facility representatives during the inspection, and information and documents provided by Facility representatives to EPA during and/or subsequent to the inspection. In addition, information gathered prior to or subsequent to the inspection from a review of EPA or State records may be included in this report.

2.0 Facility Background Information

2.1 Description of Facility

The Tamaqua plant was originally built in 1906 by the Potts Powder Company to produce dynamite and blasting powders. Atlas bought the Potts Powder Company in 1912 and expanded the Tamaqua plant to make all grades of dynamite and detonators. Atlas Powder changed its name to Atlas Chemical Industries Inc. in 1961. In 1971, Atlas was merged into Imperial Chemical Industries and became ICI America. However, due to antitrust objections to the merger raised by the United States, ICI America sold part of the Tamaqua facility in 1973, approximately 2,620 acres, consisting of the dynamite, nitroglycerin, and blasting supplies businesses, to Tyler Industries, which formed a "new" Atlas Powder Company. The remaining assets at Tamaqua, approximately 103 acres, comprised a portion of the Aerospace Components Division, a subsidiary of Imperial Chemical Industries, and did business as ICI America (the name change to ICI Americas occurred in 1977) or ICIA herein.

Imperial Chemical Industries PLC Group repurchased the explosives business from Tyler in 1990 and established it as a wholly owned subsidiary, ICI Explosives USA, Inc. or EUSA herein. In 2001, ICI Explosives USA Inc. changed its name to E-One Holdings and

transferred its assets, including the Tamaqua property, into a newly created subsidiary known as Expert Management, Inc. (EMI). In 2003, ICIA was also consolidated under EMI.

The ICIA and EUSA operations at Tamaqua ceased between 1996 and 1998. In 1997 Nitrochem Corp. bought the ICI plant, and established Copperhead Chemical Company.

The site currently operates on 875 acres of land. There are 40 buildings located on this site and 37 employees that work 7 am to 4 pm Monday to Friday.

2.2 Process Description

Copperhead is a manufacturer of pharmaceutical-grade nitroglycerin and diluted nitroglycerin mixtures for cardiac therapy and other medical treatments. Copperhead is also a manufacturer of energetic materials used by the aerospace industries for propellants, fuel additives, and munitions applications. The end products manufactured at Copperhead are intermediates for the pharmaceutical and aerospace industries.

The manufacturing process reacts glycerin with a mixture of 50 % sulfuric acid and 50% nitric acid. This mixing creates an exothermic reaction inside an insulated container. The container is wrapped with tubing which cold water is pumped through to control the temperature of the reaction.

The mixture is allowed to sit in a tank to separate in to two layers. The product will float to the top and the acid is the bottom layer. The acid is decanted from the bottom and piped to the hazardous waste acid tank.

The product moves through the pipes via gravity to a holding tank positioned in the middle of the decent. This is to prevent the material gaining too much momentum as it travels downhill to the final storage tank.

The product is then desensitized with the addition of solvents. The solvents that can be used are acetone, methylene chloride, ethyl acetate, triethylene glycol, propylene glycol and triacetin. Waxes or resins are added for the pharmaceutical products.

The facility is permitted for thermal treatment of the reactive hazardous waste generated during the production of the pharmaceutical-grade nitroglycerin and the energetic materials. The waste is placed one of three burn pads and ignited. Once the fire is out the waste is allowed to cool down. The treated hazardous waste is then handled as non-hazardous waste by the Facility.

3.0 Waste Generation

Hazardous and Nonhazardous Waste Generation

- Acid waste – managed by Facility as (waste codes) in (waste tanks + size)
- Solvent waste
- Laboratory waste
- Raw material waste
- Aerosol Cans
- Waste Oil

Universal Waste Generation

- Lamps
- Batteries

4.0 Hazardous Waste Accumulation

4.1 Hazardous Waste Accumulation Area(s) (HWAAs)

- HWAA located in Building 149.
- The hazardous waste is stored in 55-gallon containers and in bags.
- HWAA located in Building 993.

4.2 Satellite Accumulation Area(s) (SAAs)

- Multiple satellite accumulation areas located throughout facility.
- The SAA collect waste rags and personal protection equipment (PPE).

4.3 Universal Waste Storage Area(s)

- One universal waste ("UW") accumulation area located in Building 17.
- UW lamps are stored in cardboard boxes.

4.4 Permits

TSDF Permit number PAR000030874
Clean Air Act (CAA): Operating Minor PA000514500

5.0 Inspection Observations

At 10:00 am Mr. Campbell escorted the inspectors on a Facility tour around the property in a company vehicle. Photographs taken during the inspection can be found in the Photographic Log included with this report as attachment 1.

5.1 Storage Building 979

The Storage Building 979 is used to store the raw ingredients/materials for the process. No hazardous waste is generated in this building, according to the Facility representative. No satellite accumulation areas (SAAs) were observed in this building during this CEI.

5.2 Nitrate Area, Buildings 581 & 582

The nitrate area is also referred to as NG Hill by the Facility. Buildings 581 and 582 are used for the nitrating process. Building 582 is the Heater House, see photograph 1, and is where the Polyols are heated then gravity fed through piping to the Nitrator building, Building 581, see photograph 2. The 50% nitric and 50% sulfuric acid mix is weighed and then sent to the nitration tank in Building 581.

Once the reaction is completed the mixture is gravity fed to a settling tank to allow time for the separation of the acid and the Nitroglycerin. Once the acid has settled to the bottom it is drained into a pipe that diverts it to the waste acid scale house, see photograph 4. In photograph 5, the boot is moved to the left pipe run which leads to the waste acid scale house.

Once the acid is drained the boot is moved to the pipe run on the right side. In colder weather sodium carbonate water is heated to 170° F and then sent down the product piping run to raises the temperature of the piping. This keeps the nitroglycerin from solidifying in the piping as it travels to the next area. No SAAs were observed in buildings 581 and 582.

5.3 Acid Scale House Building

A tank within the acid scale house building receives the waste acid from Building 582. The acid is weighed to determine how much nitroglycerin is in it. The weight of the waste acid determines how much sulfuric acid needs to be added in a process known as "budding". This process can take a couple of hours. The waste acid is then sent to the waste acid tanks for accumulation prior to shipment offsite. The Facility representative stated that the Facility considers the tank located within the Acid Scale House Building a process tank and it is not managed as a hazardous waste tank.

5.4 Ammonia Refrigeration Building

This Ammonia Refrigeration Building houses the anhydrous ammonia and brine tanks. The anhydrous ammonia is used to cool down the brine water, which is then pumped to the Nitrator Building to maintain the reaction temperature. There were no SAA observed by the inspectors at this location.

5.5 Neutralizer Building 943

The piping from the Nitrator Building 581 runs about ¼ of a mile to the Neutralizer Building 943. The nitrate esters flow into one of four tanks maintained with a blanket of soda water to prevent the explosives from becoming acidic and then decomposing. The four tanks

are about 300 gallons each. The nitrate esters can be stored for a few weeks to a few months. When the nitrate esters are ready to be processed, up to 1000 lbs. can be weighed off in the Neutralizer Scale Tank and then sent down the pipes to the Mix & Pack Building 2015. Between Buildings 943 and 2015 there is a Swirl Tank that acts as a decelerator and disconnects the two buildings in case of an explosion. After the Swirl Tank, the nitrate esters enter the Siphon Tank Building that can regulate the volume of material that continues to the Mix & Pack. Once the material leaves the Siphon Tank Building, it enters the Mix & Pack Scale Tank and is ready to be processed. There were no SAAs observed in these buildings.

5.6 Mix and Pack Building 2015

The Nitrate Ester goes from the Neutralizer Building 943 to the Mix and Pack Building. The nitrate esters are desensitized in this building by the addition of solvents. For the pharmaceutical products, also referred to as increments, nitrate esters are mixed with polymers and propylene glycols. The second floor has 2 tanks. Tank 204 is 700 gallons and used for mixing water base polymers and nitrate esters. Tank 204 is rinsed first with water followed by acetone. Tank 505 is 300 gallons and used for mixing solvents and nitrate esters. Tank 505 is rinsed with ethyl acetate or acetone. Waste solvent coming off of Tank 204 and Tank 505 is accumulated in 55 gallon drums. According to the Facility representative, the solvent is either reused or taken from the Mix and Pack Building by a box truck to one of the Facility's HWAAs. The solvent is reused approximately 8-10 times before it is disposed of.

The inspectors observed 2 SAAs on the second floor, with one being a black 55 gallon container; see photograph 7, and the other a red 30 gallon container, see photograph 9. Both containers were labeled as hazardous waste and closed. The black container was marked as containing ethyl acetate; see photograph 8. The black container holds waste generated from incidental cleaning. The red container was marked as PPE and rags; see photograph 10. These containers were in separate areas of the second floor.

There are 2 tanks located on the ground floor. Tank T200 is used for blending, and T213 is used for premixing. The ground floor has 2 desiccators known as A and B. The nitrate esters in these desiccators go to produce rocket propellants. The water removed from the nitrate esters is sent to the onsite waste water treatment plant. There is one SAA located on the ground floor, which is used to collect waste that may be contaminated with nitroglycerin; see photographs 11 and 12. The 30 gallon container was observed to be closed and the label on top was marked with a start accumulation date of 06/20/19 . The Facility representative stated that the hazardous waste in the red containers is disposed of by the onsite thermal treatment.

5.7 Pharmaceutical Building 2016

The Pharmaceutical Building 2016, receives the increments from the Mix and Pack Building. These increments are blended with lactose, additional solvents and adhesives, which further desensitizes the nitrate esters. The final product is SDM® 7 and/or SDM® 27, which is used to manufacture IV injectables and hospital solutions, ointments, creams, and gels. This process reclassifies the material from explosive to flammable.

There are 4 areas referred to as Bays 0 (zero), 1, 2, and 3. All the mixers in this building are 3000 gallons. Each bay has an upper and lower level. Bay 0 produces oil based food additives and according to the Facility representative does not generate hazardous waste. No SAAs were observed by the inspectors in Bay 0.

Bay 1 coats lactose powder with the nitroglycerin. There are 2 ribbon blenders for homogenizing the products. Bay 1 has 1 SAA consisting of a 30 gallon red container labeled as hazardous waste and dated 07/01/2019. The waste described on the label was PPE and rags.

Bay 2 had 2 SAAs, one on each level. Each container was 30 gallons and each were marked as hazardous waste. Both containers were observed empty at the time of this CEI.

Bay 3 had 2 SAAs, one on each level. Each container was 30 gallons and each were marked as hazardous waste. Both containers were observed empty at the time of this CEI.

This building also has a receiving area and a part washing room. The part washing room had an SAA. This SAA was a clear whitish 55 gallon container labeled as hazardous waste and closed. There was no accumulation date observed on the label.

Outside Pharmaceutical Building 2016 was a tank labeled as " Danger-Hazardous Waste Acetone Flammable Liquid"; see photograph 22. The Facility representative stated that this was no longer a hazardous waste tank and is now considered a process tank. The inspectors asked what is collected in the tank. According to the Facility representative, the tank collects the waste acetone that is distilled off of the products being manufactured. Once the process is complete, the acetone is drained in to a 55 gallon container and disposed of as hazardous waste. According to the Facility representative, the waste acetone is not stored overnight in this tank. The Facility representative added that the only process change from when the tank was managed as hazardous waste tank until the time of the inspection is that the Facility went from producing a larger volume of acetone waste to about a 55 gallons or less at a time. This process operates about 12 times a year, according to the Facility representative. There is associated equipment with this tank; see photographs 23-27. No identification numbers could be observed on the equipment.

5.8 Hazardous Waste Accumulation Area Building 149

Building 149 is used for storing the hazardous waste that will be thermally treated. The inspectors observed three 2.5 gallon containers that were labeled and marked with an accumulation date. Two of the three containers can be seen in photograph 13 and photograph 14 is a closeup of one of the labels. Observed on the wall was a clip board containing a document titled "Thermal Treatment Area-Daily Shipment Log"; see photograph 15.

The inspectors also observed 2 bags and 17 containers labeled as hazardous waste in this building. The 2 bags contained materials, such as PPE, contaminated with nitrate esters while the 17 containers were empty. The containers were 30 gallon capacity and, since they have been in contact with the nitrate esters, they will be thermally treated.

There were 4 more bags containing hoses from various areas of the process. The hoses are changed out for maintenance purpose. These bags were labeled hazardous waste, marked with start accumulation dates and closed.

The inspectors did not observe any start accumulation dates on the containers in Building 149 that would indicate greater than 90 day storage.

5.9 Magazine 5

Magazine 5 building is the location of the Facility's other HWAA. The building stores pharmaceutical product and products deemed explosive. The waste stored in this building is referred to as slum. The slum waste comes from the nitration and neutralization processes. Eighty pounds of the slum material is mixed with 20 pounds of wood pulp. The slums are then thermally treated on site and the jugs they are contained in are burned after 5 years. The inspectors observed 18 five gallon containers labeled hazardous waste and closed. The earliest start accumulation date observed was 05/10/2019.

5.10 Waste Acid Tanks

The Facility has 2 hazardous waste tanks for waste acids; see photograph 16. The Facility stated that only one tank is used. The white tank on the left side in photograph 16 was recoated and did not have a hazardous waste label on it. The secondary containment was coated with an epoxy according to the Facility representative.

5.11 Drum Storage Building 993

Drum Storage Building 993 is a roofed, pavilion-like structure with a fence surrounding a secondary containment; see photograph 17. Hazardous waste, non-hazardous waste, and raw materials are stored on this pad. The inspectors observed 7 containers closed and labeled hazardous waste. The earliest start accumulation date observed was 4/30/2019; see photographs 18 and 19.

5.12 Pharmaceutical Warehouse Building 999

The Pharmaceutical Warehouse Building 999 is used for storing raw ingredients and finished products. No SAAs were observed in this building at the time of the inspection.

5.13 Building 17

Building 17 is used to store universal wastes, decommissioned equipment and wooden pallets. The inspectors observed three open containers of lamps that the Facility determined to be waste; see photographs 20 and 21. There were no markings or labels observed on the containers to identify the contents as universal waste lamps. No start accumulation date was observed on the box and the Facility representative said the Facility does not have an alternative method of tracking the accumulation time of the waste lamps.

5.14 Laboratory Building 728

The High Performance Liquid Chromatograph ("HPLC") laboratory located on the first floor tests raw materials and finished products. The inspectors observed 3 SAAs in this laboratory. The first SAA observed was a 2.5 gallon container that was observed to be closed, labeled as hazardous waste and under a fume hood; see photograph 31. The hazardous waste label was marked with a start accumulation date of 7/11/19; see photograph 32. The next SAA container was observed to be closed and labeled as hazardous waste; see photograph 33. The third SAA in this laboratory was a 2.5 gallon container observed under the HPLC machine in a cabinet. The container was labeled hazardous waste and closed. Each of the 3 containers were marked as containing nitroglycerin with the waste codes D001 and D003.

The next laboratory area on the first floor contained 4 SAAs. Two SAA containers were identical to the container seen in photograph 33. Each were observed closed at the time of this CEI. The containers were labeled as hazardous waste and marked as containing solid nitroglycerin with the waste codes D001 and D003. The other 2 SAAs were 2.5 gallon containers labeled as hazardous waste and closed. The label was marked with waste nitroglycerin mixture desensitized liquid. The waste codes on these labels were also D001 and D003.

The second floor laboratory area had 1 SAA container observed by the inspectors. The SAA container was closed and labeled hazardous waste. The label was marked with "Hazardous waste solid n.o.s. (Nitroglycerin)". The waste codes on this label was also D001 and D003. The container label was not marked with a start accumulation date.

5.15 Thermal Treatment Area

The thermal treatment area is surrounded by a chain link fence; see photographs 28 and 29. There are 3 bays each containing a burn pad; see photograph 30. The bays on the either side are insulated with coal ash underneath the burn pads. The left side burn pad is designated number 1 and the right side is number 3. The permit allows burn pads 1 and 3 to treat up to a 100 pounds. Burn pads 1 and 3 are where the slums are burned. The middle bay is burn pad number 2 and can treat up to 200 pounds. Once burning is completed the ash is placed on the cooling pads seen in photograph 28 and 29. The ash is then placed in a roll off container and sent off site as non-hazardous waste; see attachment 2 for waste profile.

6.0 Records Review

6.1 Uniform Hazardous Waste Manifests

I requested Uniform Hazardous Waste Manifests ("UHWMs") from 2017 to 2019. The designated facilities ("DFs") observed were as follows;

- Cycle Chem, Inc. (EPA ID No. PAD067098822)
- Stablex Canada, Inc. (EPA ID No. NYD980756415)
- Republic Environmental Systems (PA), Inc. (EPA ID No. PAD085690592)

The number of UHWMs observed by the inspectors for each year is as follows;

- 2017 – 16 shipments
- 2018 – 19 shipments
- 2019 – 10 shipments at the time of the CEI

UHWMs for each year showed the corrosive waste (D002) was transported to Stablex Canada, Inc. by tanker trucks. The amount observed on the UHWMs was usually around 40,000 pounds. The other two DFs received other types of hazardous wastes, such as, but not limited to, acetone with nitroglycerin, waste adhesives, sodium hydroxide, lead acetate with arsenic oxide, and acetone with heptane.

All UHWMs observed were signed by the DFs and Land Disposal Restriction notification forms were observed for each waste stream to each DF.

6.2 Inspection Records for Hazardous Waste Storage Areas (HWAAs)

The Facility's HWAA weekly inspection records from 2016 through 2019 were provided for review at the inspectors' request. The HWAA weekly inspection documents were observed to be titled "Copperhead Chemical Company Inc. Inspection Record for Hazardous Waste Storage Areas". The records include 4 locations which are Building 149 (Old Magazine 1), Building 841, Building 993 (Drum Storage Pad), and Magazine 5; see attachment 3.

No gaps were observed during the review of the records provided. The records were initialed by Mr. Campbell (KC), Mr. Scott Smith (SJS), or Mr. Dan Hedemann (DMH). Each record of each year had the statement "No Hazardous Wastes" in the row for Building 841.

The inspector noted that on the January 2019 HWAA weekly inspection logs, a hazardous waste drum with a start accumulation date of 10/3/18 was present in Building 993 on 1/4/19 with a note to arrange a hazardous waste pick up as soon as possible. Additionally, it was noted that on the February 2017 HWAA weekly inspection log indicated that (a container) was stored for greater than 90 days; see attachment 3.

6.3 Hazardous Waste Training and Job Descriptions

Records for hazardous waste training from 2017 to 2019 were requested by the inspectors. In 2017 Hazardous Waste Operations and Emergency Response (HAZWOPER) was conducted by HM Tech. There was a sign-in sheet for an 8 hour and 24 hour course instructed by John Kovacic of HM Tech.

In 2018 there are a sign-in sheets for 24 hour Hazardous Waste Worker Refresher, HW Supervisor Refresher Training, Treatment Storage And Disposal Facility Worker/Supervisor Refresher Training. The training was provided by Cocciardi and Associates, Inc.

In 2019 description of training provided were Haz-Mat Training, Recognition & Identification, Health & Safety, HazCom/SDS, HM Properties, Container Failures, Chemical Protective Equipment, Decontamination, Air Monitoring, Methods of Mitigation, Confined Space/Lock Out-Tag Out, Incident Management/ICS. The sign-in sheet included 31 employees and indicated a test was given at the end of the training. The instructors listed on the sign-in sheet were Don Herb and Doug Everlot.

Mr. Campbell provided a certificate of the 2 day RCRA Hazardous Waste Management Workshop training he received on June 14, 2019 by Lion Technology Inc.; see attachment 4.

Job titles and descriptions were observed in the Preparedness, Prevention, and Contingency (PPC) Plan for Pharmaceutical and Nitration Operators, Lab Technicians, Truck Crew/Laborers, Environmental & Utilities Operator, and Maintenance Department.

6.4 Preparedness, Prevention, and Contingency (PPC) Plan

The Facility's Preparedness, Prevention, and Contingency (PPC) Plan reviewed was updated in October 2018. The emergency coordinators (ECs) listed were Kaiya Campbell, Dan Hedemann, and Kim Ann Shimukonas. The PPC plan listed each of the EC's address, phone numbers, and duties/responsibilities.

The PPC plan contained a list and location of the emergency equipment as well as the evacuation plan with the routes and rally points. The PPC plan contained a local authority distribution list that included: fire dept, PADEP, county emergency managment agency, medical center, ambulance association and police material.

6.5 Biennial Report

The review of the Facility's 2015 Biennial Report record shows that 13,815 pounds of hazardous waste was thermally treated by the Facility. The other reported wastes were 170 pounds of Lab packs with many waste codes listed. There was 2,340 gallons of spent solvent along with 55 gallons of isopropanol and 55 gallons of toluene reported for 2015. This material

was sent to Cycle Chem, Inc. The other hazardous waste reported in 2015 was 278,000 metric tons of sulfuric and nitric acid sent to Stablex Canada, Inc.

The review of the Facility's 2017 Biennial Report record shows that 12,682 pounds of hazardous waste was thermally treated by the Facility. Also reported in 2017 was 158 metric tons of sulfuric and nitric acid sent to Stablex Canada, Inc. The Facility reported sending 2,065 gallons of spent solvent, 100 gallons of waste adhesives and 760 pounds of lab packs to Cycle Chem. Lab packs, 151 pounds, were also sent to Republic Environmental Systems (PA), Inc.

6.6 Hazardous Waste Permit

The Facility's Hazardous Waste Permit was issued by Commonwealth of Pennsylvania Department of Environmental Bureau of Land Recycling and Waste management and has an effective date of November 14, 2011 and an expiration date of November 14, 2021; attachment 5. The requirements for thermal treatment are located on page 9 in this document.

6.7 Hazardous Waste Tanks Certification And Daily Inspection Records

The Facility was unable to provide a certification for the hazardous waste acetone tank located outside of the Pharmaceutical Building 2016. The assessment of the Facility's 2 hazardous waste acid tanks certification was performed by Oransky Engineering and Consulting on June 25, 2012. According to this document, this certification was based on visual evaluations, measurements and corrosion rates for shell, head, and piping. Thickness of the tanks were performed using an ultra-sonic thickness gauge.

Estimated lives of each tank were provided as follows;

- Tank T52 (DEP #004) 23 years
- Tank T98 (DEP # 012) 74 years
- DEP # 015 67 years

Inspections of the hazardous waste acid tanks are performed daily by the security guards at least once per shift. The inspectors requested copies of records dated July 14 to 15, 2019 and December 31, 2018 to January 1, 2019. These records are titled "Security Punch Locations & Inspections"; see attachment 6. These records document areas inspected throughout the site including the acetone hazardous waste tank and both hazardous waste acid tanks. The personnel conducting these inspections are Chuck Helms, Nick Knorr, David Coppelli, Paul Kennedy, Robert Link, and Sean Bohor. Mr. Campbell stated that these individuals do not receive hazardous waste training. There were no missing days observed for the daily inspection logs.

7.0 Closing Conference

The closing conference was attended by EPA representatives, Mr. Forostiak and Ms. Serfass, and Facility representatives Mr. Campbell and Mr. Charles Cappuccino, Operations Manager.

The inspectors informed the Facility representatives that, although they are not authorized to make violation determinations at the time of the inspection, they would communicate inspection observations and areas of concern with the Facility representatives. The inspectors also informed the Facility representatives that areas of concern communicated to them during the closing conference are subject to change after a complete review of all pertinent information.

The following areas of concern were communicated to the Facility representatives at the time of the inspection:

- The acetone hazardous waste tank and its associated equipment may be subject to the Subpart BB & CC requirements of RCRA
- Universal waste lamp containers were not closed and not labeled with the proper wording.
- Universal waste lamp containers were not marked with an accumulation nor does the facility track the accumulation time
- The security guards performing the daily hazardous waste tank inspections do not receive hazardous waste training

8.0 Post-Inspection Documents

The documents listed below were provided by Mr. Campbell after the CEI; see attachment 7.

- Thermal Treatment Area - Ash storage Container Inspection
- Thermal Treatment Area – Daily Shipment Log
- Facility Operation Summary